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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANTS UBER TECHNOLOGIES,  
INC.'S AND OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL THEIR OPPOSITION TO  
WAYMO'S MOTION TO COMPEL  
FURTHER 30(b)(6) TESTIMONY**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc.’s and  
7 Ottomotto LLC’s Administrative Motion to File Under Seal Their Opposition to Waymo’s Motion to  
8 Compel Further 30(b)(6) Testimony (the “Administrative Motion”). The Administrative Motion seeks  
9 an order sealing the entirety highlighted portions of the Opposition Letter Brief and Exhibits 2 and 3  
10 thereto.

11 3. Certain portions of Exhibits 2 and 3 contain or refer to trade secret information, which  
12 Waymo seeks to seal.

13 4. Exhibit 2 (highlighted portions at 161:7-8; 162:14-18, 22-23; 163:1, 4; 164:1; 167:2-3,  
14 11-12; 174:8-9) and Exhibit 3 (highlighted portions in Gruver Tr. at 250:1-11; 251:23-25; 290:1-12;  
15 359:4-15; 359:23-25; 409:1-9; highlighted portions in Pennecot Tr. at 202:10; 203:18-19, and red  
16 boxed portions in Schwarz Tr. at 179:5-23; 182:3; 182:7; 182:17; 183: 2-5; 183:12-13; 183:19-22)  
17 contain, reference, and/or describe Waymo’s trade secret information. The information Waymo seeks  
18 to seal reflects the confidential design and functionality of Waymo’s proprietary autonomous vehicle  
19 system (as misappropriated by Defendants), including its LiDAR trade secrets, which Waymo  
20 maintains as secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-  
21 47) and that the designs are valuable to Waymo’s business (Dkt. 25-31). The public disclosure of this  
22 trade secret information would give Waymo’s competitors access to descriptions of the functionality  
23 or features of Waymo’s autonomous vehicle system. If such information were made public, I  
24 understand that Waymo’s competitive standing would be significantly harmed.

25 5. Waymo’s request to seal is narrowly tailored to those portions of Exhibits 2 and 3 that  
26 merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United  
2 States of America that the foregoing is true and correct, and that this declaration was executed in San  
3 Francisco, California, on August 30, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC

7  
8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
10 document has been obtained from Felipe Corredor.

11  
12 By: /s/ Charles K. Verhoeven

13 Charles K. Verhoeven